

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Leon D. Chambers	<u>Debtor(s)</u>	CHAPTER 13
PNC BANK, NATIONAL ASSOCIATION	<u>Secured Creditor</u>	
vs.		NO. 19-14923 MDC
Leon D. Chambers	<u>Debtor(s)</u>	
Kenneth E. West Esq.	<u>Trustee</u>	11 U.S.C. Section 362

**STIPULATION**

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. The post-petition arrearage on the mortgage held by the Secured Creditor on the Debtor's residence is **\$21,416.60**, which breaks down as follows;

Post-Petition Payments:	August 2020 at \$1,153.20/month
	September 2020 through August 2021 at \$1,183.13/month
	September 2021 through February 2022 at \$1,193.43/month
Suspense Balance:	(\$1,094.74)
<b>Total Post-Petition Arrears</b>	<b>\$21,416.60</b>

2. The Debtor(s) shall cure said arrearages in the following manner;

a). Within seven (7) days of the filing of this Stipulation, Debtor shall file an Amended Chapter 13 Plan to include the post-petition arrears of **\$21,416.60**, which is to be paid by the Trustee through Debtor's Chapter 13 Plan to Secured Creditor.

3. If the instant bankruptcy is terminated by either dismissal or discharge, this agreement shall be null and void, and is not binding upon the parties.


4. The provisions of this stipulation do not constitute a waiver by the Secured Creditor of its right to seek reimbursement of any amounts not included in this stipulation, including fees and costs, due under the terms of the mortgage and applicable law.

5. The parties agree that a facsimile signature shall be considered an original signature.

Date: March 15, 2022

/s/ Rebecca A. Solarz, Esquire  
Rebecca A. Solarz, Esquire  
Attorney for Movant

Date: 3/17/22

  
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Ashley M. Sullivan, Esq.  
Attorney for Debtor(s)

No Objection - Without Prejudice to Any  
Trustee Rights or Remedies  
/s/ LeeAne O. Huggins

March 22, 2022  
Date: \_\_\_\_\_

\_\_\_\_\_  
Kenneth E. West, Esq.  
Chapter 13 Trustee

Approved by the Court this \_\_\_\_\_ day of \_\_\_\_\_, 2022. However, the court retains discretion regarding entry of any further order.

\_\_\_\_\_  
Bankruptcy Judge  
Magdeline D. Coleman